



CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

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November 30, 2011

Mr. Fethi Benjemaa
Department of Water Resources
901 P Street
Sacramento, CA 95814

Submitted Via Email: jemaa@water.ca.gov

RE: COMMENT LETTER-QUANTIFYING EFFICIENCY OF AGRICULTURAL WATER USE

Dear Mr. Benjemaa:

On behalf of more than 74,000 agricultural and associate members the California Farm Bureau Federation appreciates the opportunity to comment on your draft report to the Legislature regarding Quantifying the Efficiency of Agricultural Water Use.

Farm Bureau's purpose is to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide safe reliable healthful food and farm products through responsible stewardship of our diverse natural resources. California's farmers and ranchers are absolutely committed to reasonable and efficient use of our scarce water supply.

Since the passage of SBx7 7 in 2009 Farm Bureau has been actively involved with the Department of Water Resources, the Agricultural Water Management Council and other stakeholders in the Agricultural Stakeholders Committee to develop a practical and realistic methodology for quantifying the efficiency of agricultural water use.

We are concerned with the low attendance at recent workshops that were scheduled to take public comment on the draft report. Because the draft report and the announcement for the workshops were released to the public only five days prior to the first workshop we ask that you extend the public comment period. Because it is clear there will be difficulty meeting the December 31, 2011 deadline to send the report to the Legislature, we ask that you take a little extra time in an effort to get the necessary input on this complex issue.

In the mean time we offer the following comments on the specifics of the draft report.

Format the report with an easy to understand executive summary or a layman's overview up front and a clear recommendation to the Legislature on a preferred methodology to quantify efficiencies in agricultural water use.

Clearly call out the difference between "methods" and "indicators." For example, productivity indicators are just that, and do not represent the true value of a commodity based on the volume of water applied. This can lead to misunderstandings of why some commodities are and should be grown in a particular region.

3.2 Methods. Methods 1 through 3 must apply only at the regional level. Method 6, measuring distribution uniformity across an individual field continues to be a useful tool to growers. Some irrigation districts, resource conservation districts and mobile labs have successfully assisted growers by evaluating their water use efficiency and distribution uniformity, but it is important to protect this individual and proprietary information if our goal is to educate growers and improve their irrigation efficiency. Additionally, mandating such activities will cause undo financial burdens on the public and private sectors.

4.2 Indicators. As previously stated, we ask that you carefully explain the difference between methods and indicators to avoid unintended consequences by those who would not understand the shortcomings of indicators. The complexities of markets and the secondary value of some commodities are just a couple examples of how indicators can be used to inappropriately and detrimentally affect cropping patterns.

5.2 Implementation Plan. Implementation at any scale will be costly. Given the condition of the state economy and thus the state budget, and the recent increase in water fees to water users we recommend a slow and careful approach to implementing any methodology. Flexible goals and a schedule of implementation is a must for a truly successful outcome. Unrealistic goals and rigid timelines will surely produce failure.

Again, we appreciate the opportunity to comment and look forward to continuing to work with you and resolving issues as they arise. You can contact me at (916) 446-4647 or at dmerkley@cbbf.com should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Danny Merkley". The signature is fluid and cursive, with the first name "Danny" and last name "Merkley" clearly distinguishable.

Danny Merkley
Director, Water Resources